

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

United State of America)
v.) Cr. No. 23-CR-12-1-PB
Rhonda Simpson,)
Defendant.)

JOINT ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARINGS

NOW COMES Defendants, Rhonda Simpson and David Montoya, by and through counsel, with the Government's assent, respectfully move to continue their respective Sentencing Hearing in this matter. In support thereof, Defendants state as follows:

1. Rhonda Simpson's Sentencing Hearing is presently scheduled for October 28, 2024 at 10:00 a.m. and David Montoya's Sentencing Hearing is scheduled for November 4, 2024 at 10:00 a.m.

2. On August 9, 2024, Probation filed its draft presentence investigation report for each Defendant.

3. On August 29, 2024, the Government requested to continue Defendants' Sentencing Hearing to allow the parties additional time to work through certain objections to the draft presentence reports with the Probation Officer. The Court granted the requested continuance.

4. The parties continue to engage in discussions with the Probation Officer to work through the objections to the draft presentence reports. However, additional time is needed to resolve these issues.

5. Accordingly, Defendants respectfully move to continue their respective Sentencing Hearing. The parties have consulted with the Deputy Clerk and propose moving Rhonda Simpson's Sentencing Hearing to December 10, 2024 at 2:00 p.m. and David Montoya's Sentencing Hearing to December 17, 2024 at 10:00 a.m.

6. AUSA Charles Rombeau advised he assents to the requested continuances.

7. Due to the nature of the relief sought herein, no memorandum of law is necessary.

WHEREFORE, Defendants respectfully request that this Honorable Court:

a. Grant the within Motion;

b. Continue Rhonda Simpson's Sentencing Hearing to December 10, 2024 at 2:00 p.m. and David Montoya's Sentencing Hearing to December 17, 2024 at 10:00 a.m.;

c. Grant such further relief as this Court deems necessary and just.

Respectfully submitted,

Rhonda Simpson
By Her Attorneys:
SHAHEEN & GORDON, P.A.

Dated: October 21, 2024

/s/ William E. Christie
William E. Christie
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Respectfully submitted,

David Montoya,
By His Attorney,

Date: October 21, 2024

/s/ Robert M. Goldstein
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this day been filed with the Court using the Court's filing system and served on all counsel of record.

/s/ Willian E. Christie
William E. Christie
NH Bar #11255